

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

----- X

UNITED STATES OF AMERICA, :  
:  
vs. : No. 22-cr-352 (JSR)  
ANTHONY MCGEE, KAHEE SMALL, :  
DAMON DORE, RAHMIEK LACEWELL, :  
ET AL. :  
  
Defendants.

----- X

**NOTICE OF MOTION IN LIMINE TO EXCLUDE EVIDENCE OF GANG  
AFFILIATION**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, and all prior papers and proceedings, Defendants Anthony McGee, Kaheen Small, Damon Dore, and Rahmiek Lacewell (hereinafter, collectively, “the Moving Defendants”) respectfully move this Court before the Honorable Jed S. Rakoff, United States District Judge, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, NY 10007, for an order prohibiting the government from introducing any evidence that references or implies that any of the Moving Defendants are affiliated with a gang.

Dated: February 13, 2023

Respectfully submitted,

/s/ Glen A. Kopp

Glen A. Kopp  
MAYER BROWN, LLP  
1221 Avenue of the Americas  
New York, NY 10020  
Tel: (212) 506-2648

/s/ Jean D. Barret

Jean D. Barrett  
RUHNKE & BARRETT  
47 Park Street  
Montclair, NJ 07042  
Tel: (973)744-1000

/s/ Daniel L. Stein

Daniel L. Stein  
WEIL, GOTSHAL & MANGES LLP  
767 Fifth Avenue  
New York, NY10153  
Tel: (212) 310-8140

*Attorney for Anthony McGee*

*Attorneys for Rahmiek Lacewell*

/s/ Lisa Scolari

Lisa Scolari  
LAW OFFICE OF LISA SCOLARI  
20 Vesey Street  
Suite 400  
New York, N.Y. 10007  
Tel: (212) 227-8899

*Attorney for Kaheen Small*

/s/ Michael D. Bradley

Michael D. Bradley  
BRADLEY LAW FIRM PC  
2 Park Avenue, 20th Floor  
New York, NY 10016  
Tel: (212) 235-2089

*Attorney for Damon Dore*